

**Dahiya Law Offices LLC
350 Broadway Suite 412
New York New York 10013
Tel: 212 766 8000**

Karamvir Dahiya, Esq.
Counsel for Debtor

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

-----X Case No. 11-46867-CEC

INRE:

MAN KIT NG,

Debtor,

-----X Adv. Case No. 12-1343-CEC

**ROBERT L. GELTZER, as Trustee
Of the Estate of MAN KIT NG,**

Plaintiff,

-against-

MAN KIT NG,

Defendant.

-----X

RESPONSE TO THE DISCOVERY DEMAND.

I, the undersigned, the debtor, Mankit NG responds as follows to the discovery demands of the trustee as per paragraph C of the Demand under the penalty of perjury:

1. Invoices: We did not invoice the customers. It was cash basis. We had put a board telling the customer the price of each service. The services offered were hair cut, hair wash, coloring and perm. The board was clear. The customer, if they agreed with the price would ask for such services. Nothing was billed. However I some invoice of the hair product suppliers. Ex.
2. Bank Statements: I have mailed to the trustee whatever bank statements I had regarding 6 years time about my business (Statements from November 2001 through August 2010). Personal Bank statements, I have been able to collect some and I am sending them now. Personal Bank statements provided are as follows:

2006: 4-17-06 to 10-15-06
2007: 1-16-07 to 2-15-07; 6-18-07 to 12-16-07
2008: 1-16-08 to 12-16-08
2009: 12-16-08 to 7-15-09
2010: 2-16-10 to 12-15-10
2011: 12-16-10 to 6-26-11
3. The above mentioned are the only bank statements that I could collect. Ex.
4. Statements of accounts receivables and payable: I had a very little shop. There are no accounts receivables. If I had cut someone's hair on credit. That person either came back to pay me or if they did not come back, I had no means of getting in touch. We recognized people from their faces, did not keep accounts for people or their contact information.
5. Periodic Credit Card Statement: Attached is the only credit card statements that I have and I am giving them to my lawyer to be given to the trustee. I have no other credit card statements. I am told that the debt was sold to other companies. I do not know where to get them from and also I do not have not money to pursue it further.
6. Fronts and backs of cancelled checks: In the attached bank statements that I am providing to the trustee, it has copies of the checks. I do not have any other checks. So I cannot make copies of fronts and backs. For the business checking, I have

already mailed the trustee the statements which will have copies of any checks that were written.

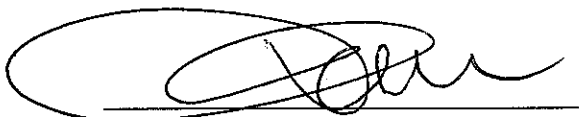
7. Ledgers. My shop had three partners including me. It was a small shop and I did not make any ledgers.
8. Sales register tapes. I do not know what it means, it was hand that took the little cash from the customers and used it to run the shop and pay our expenses. Once again, it was a little shop attracting ethnic people for hair cut. Once in a while we will get some teenager wanting to have some hairdos of punk fashion. But they did not have big money. Some will pay 20 dollars or 29 depending on the complex nature of hair or the complexity of the demand.
9. Bills I do not have any bills copies with me regarding the business. The business is closed, I could not pay the rent. Once the bills were paid, I did not keep copies.
10. Password for computers: I had one computer for personal use, it was used for entertainment, listen to songs, play some games. I did not have any passwords. I am not a big business man. I did not have CPAs working for me.
11. Worksheets. I am a barber. My worksheet is the design that the customer would tell me and I would listen. I imagined in head as to what style that customer is looking for. I will use shampoo to soften the hair and give style based on what the client would tell me. I did not design anything on a piece of paper. If I had to design on a piece of paper the client would not even come back to me, nor will they have the patience to stay and see my design.
12. Workpapers. I did not have any work papers. My work did not involve paperwork, it involved scissors, shampoo bottles, combs, hair dryer, steamer, hair lotions, hair colors etc. I had the cheapest possible products, I had no money.
13. Notes. I did not make notes, nor were notes necessary. The customer wanted the design, hair style the very moment he was there in my shop. I did not have the luxury or the necessity of making notes. I am not a big scientist with any hidden intellectual achievements.
14. Manual records. I do not have any records other that was given to the trustee or being given now. I had given hair cut to people and nothing was reduced to any manual.

15. Tax Returns. I have given the trustee the tax returns 2007 to 2011. I am now sending him the tax returns of 2005 and 2006. So I have given him complete set of tax returns. I am arranging now from the accountant to get a copy of the tax returns for the shop .
16. Investments. I have no investments other than goodwill with public. People were my investments. If they were happy, I was happy. Since I do not have the shop anymore, there is no more any investments. I have one house. The address is 34 Chrissy Court, Staten Island, NY 10310. I own it with my exwife. The value of the
17. Brokerage. I do not know what to state about it. I do not understand the meaning of this word.
18. Retirement: I do not have any retirement plan or account.
19. 401 (K). I do not have any 401(k) plan.
20. Insurance policies. I do not have any insurance policy.
21. Documents reflecting the Debtor's interests in other business and real estate: I do not have any other business. Only business I had was the shop which is not there anymore. I have a house with ex wife.
22. Loan documents regarding any loans to and or from related entities and their officers and directors and friends and relatives of the Debtor. I do not any loan transactions to report.
23. Bank deposit slips. I do not have all bank deposit slips. I did not keep many of them.
24. Copies of checks received: I had only cash business as a hair cutter. People never paid in checks, nor did I ever receive any checks from any customer. Customers do not pay by checks usually in my business.
25. Tapes and/disks: I do not have any tapes or disks. I did not make any tapes or disks.
26. Contracts: In my hair cutting business there were never contracts lasting for more than 30 minutes. Contracts were oral ones, customer wanted the hair cut and I cut it and they paid in cash. Contracts entered and contracts completed. There was never any paperwork.
27. Agreements. It was always oral agreements and they are all complete and paid. There is no outstanding balance from any customer.

28. Fixed assets. I do not have any fixed asset. There was a shop on lease, I did not pay the lease and it was all gone. I do not have any thing other than the house.
29. List of major customers and suppliers. My customers I did not keep a roll. They came and went. My shop was in flushing. Most of my customers were illegal immigrants. They wanted a hair cut, and I am not even sure if the names they told me was right or wrong. Most of them did not have an ID. I also did not look or ask for the ID. My focus was the hair and the design they wanted. Most of time they left it to me to cut the way I wanted to cut. Major customers were illegal immigrants or young boys and girls from Asian communities. Supplier for hair shop products was Milbon. Ex.
30. Lists of inventory, and/or any other fixed assets: in the business, we had 10 mirrors fixed in the wall, 7 chairs, 3 washing chair, one old sofa, 4 galon shampoo, head spray 12, 30 color bottles. Perm lotions (24), combs (20), one small washing machine. One dryer. Light bulbs 20, some toilet papers, two brooms.
31. Any appers and/or pleadings related to legal actions, correspondence, memoranda, etc.: Only action is this bankruptcy action and all papers are with the trustee and in his knowledge.
32. Any and all documents relating to the any transactions between and or among the debtor and any insiders of the debtors, as that term is defined in the bankruptcy code: I have no papers regarding such a demand.


Man Kit NG

Sworn to before me this day of
May 31, 2013



Notary Public

